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13 Attorneys for Defendants  
WELLS FARGO BANK, N.A.; WELLS FARGO &  
14 COMPANY

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION  
17

18 MONTE RUSSELL and DANIEL  
FRIEDMAN, on behalf of themselves  
19 and others similarly situated,

20 Plaintiff,

21 vs.

22 WELLS FARGO & COMPANY,  
23 Defendants.  
24

CASE NO. C 07-03993 CW

JUDGE CLAUDIA WILKEN  
COURTROOM 2

**JOINT ADMINISTRATIVE MOTION  
TO FILE EXHIBIT TO THE  
AMENDMENT TO SETTLEMENT  
AGREEMENT UNDER SEAL AND  
[PROPOSED] ORDER APPROVING  
THE FILING OF EXHIBIT UNDER  
SEAL**

25  
26 Plaintiffs MONTE RUSSELL and DANIEL FRIEDMAN (hereinafter,  
27 “Plaintiffs”), individually and on behalf of the class, and defendants WELLS FARGO  
28

1 BANK, N.A. and WELLS FARGO & COMPANY (hereinafter “Defendants”) have  
2 entered into an Amendment to Settlement Agreement Between Plaintiffs and Defendants.  
3 Pursuant to Local Rule 79-5, the parties jointly move to file Exhibit A to the parties’  
4 Amendment to Settlement Agreement under seal. The instant motion is a joint motion as  
5 provided in the parties’ stipulation attached hereto.

6 Under the terms of the parties’ Settlement Agreement, each member of the Plaintiff  
7 Class shall have full access to the parties’ Settlement Agreement, including the aggregate  
8 settlement amount for the Plaintiff Class, the amount of attorneys’ fees, costs, expenses  
9 and disbursements to be requested by Plaintiffs’ Counsel, the amounts Plaintiffs’ Counsel  
10 intends to request as service payment to the proposed Class Representatives for their  
11 service to the Plaintiff Class, and the Plaintiff Class Member’s individual settlement  
12 payment under the terms of the parties’ Settlement Agreement. Also, under the terms of  
13 the parties’ Settlement Agreement, each member of the Plaintiff Class shall not have  
14 access to Exhibits to the parties’ Settlement Agreement, which contain materials outlining  
15 sensitive and personal data concerning individual Plaintiff Class Members’ job positions,  
16 salaries, and settlement awards.

17 As more fully explained in the Declaration of Theresa Kading, filed concurrently  
18 herewith, the sensitive and personal nature of the material set forth in Exhibit A to the  
19 Amendment to Settlement Agreement dictate that the parties file such material under seal  
20 with the Court’s approval pursuant to Local Rule 79-5.

21 DATED: April 14, 2010

LARSON KING, LLP  
T. JOSEPH SNODGRASS  
KELLY A. SWANSON

22 By: /s/ T. JOSEPH SNODGRASS  
23 T. JOSEPH SNODGRASS

24 Attorneys for Plaintiffs  
25 MONTE RUSSELL and DANIEL FRIEDMAN  
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1 DATED: April 14, 2010

HODEL BRIGGS WINTER LLP  
GLENN L. BRIGGS  
THERESA A. KADING

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5 By: /s/ GLENN L. BRIGGS  
GLENN L. BRIGGS

6 Attorneys for Defendants  
7 WELLS FARGO BANK, N.A.; WELLS FARGO  
& COMPANY

8  
9 **[PROPOSED] ORDER**

10 PURSUANT TO STIPULATION, IT IS SO ORDERED that:

- 11  
12 1. Exhibit A to the parties' Amendment to Settlement Agreement contains  
13 material outlining sensitive and personal data concerning individual  
14 Plaintiff Class Members' settlement awards.  
15 2. As such, Exhibit A to the parties' Amendment to Settlement Agreement  
16 shall be filed under seal with the Court pursuant to Local Rule 79-5.  
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18  
19 Dated: \_\_\_\_\_, 2010

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22 CLAUDIA WILKEN  
DISTRICT COURT JUDGE  
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